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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

ANDREA LAURIA,

Plaintiff,

vs.

UNITED STATES OF AMERICA and
BERT CHRIS HEITSTUMAN,

Defendants.

Case No. 3:20-cv-00210-SLG

**PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT ON DEFENDANT BERT
CHRIS HEITSTUMAN**

Plaintiff Andrea Lauria, by and through counsel Cashion Gilmore & Lindemuth, and pursuant to Civil Rule 55, requests that the clerk enter default on Defendant Bert Chris Heitstuman.

After attempting service numerous times, defendant Bert Chris Heitstuman was served with the Second Amended Complaint while he was in custody at the

Anchorage Jail on March 1, 2021.¹ Heitstuman did not respond to the complaint. He was served with the Third Amended Complaint on July 2, 2021 as stated in the Notice of Service of Defendant at Docket 30.²

More than 21 days have passed since service of the summons and Third Amended Complaint on Defendant Heitstuman. Heitstuman has failed to plead or otherwise defend this action and therefore Plaintiff Andrea Lauria is entitled to judgment by default.

DATED this 2nd day of September 2021, at Anchorage, Alaska.

CASHION GILMORE & LINDEMUTH
Attorneys for Andrea Lauria

/s/ Mera Matthews

Mera Matthews
Alaska Bar No. 0605020
John P. Cashion
Alaska Bar No. 9806025

CERTIFICATE OF SERVICE:

I hereby certify that a true and correct copy of the foregoing was served electronically on September 2, 2021 via the Court's CM/ECF system on the following:

Marie Scheperle
Marie.Scheperle@usdoj.gov

Seth Beausang
seth.beausang@usdoj.gov
By: s/ Mera Matthews

¹ See Attached Affidavit-Return of Service dated March 1, 2021.

² See Attached Affidavit-Return of Service dated July 2, 2021.